

NOAH G. BLECHMAN (State Bar No. 197167)
noah.blechman@mcnamaralaw.com
AMY S. ROTHMAN (State Bar No. 308133)
amy.rothman@mcnamaralaw.com
KEREN SCHLANK (State Bar No. 310389)
keren.schlank@mcnamaralaw.com
McNAMARA, NEY, BEATTY, SLATTERY,
BORGES & AMBACHER LLP
3480 Buskirk Avenue, Suite 250
Pleasant Hill, CA 94523
Telephone: (925) 939-5330
Facsimile: (925) 939-0203

Attorneys for Defendants
CITY OF PLEASANTON, DANIEL KUNKEL, ERIC GORA,
and MARK SHELDON

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

THE ESTATE OF JOHN DEMING, JR.;
and JOHN DEMING, SR. and LINDA
STASI, individually, and as successors-in-
interest and wrongful death heirs to
DECEDENT JOHN DEMING, JR.,

Plaintiff,

vs.

CITY OF PLEASANTON;
PLEASANTON POLICE DEPARTMENT;
DANIEL KUNKEL, an individual and
officer; ERIC GORA, an individual and
officer; MARK SHELDON, an individual
and officer; TYLER PAULSEN, an
individual and officer; BRADLEY
PALMQUIST, an individual and officer;
OFFICER BENNETT, an individual and
officer; and DOES 1 through 50, inclusive,

Defendant.

Case No. C16-02964 CRB

**STIPULATION AND ~~PROPOSED~~ ORDER
DISMISSING ENTIRE ACTION, WITH
PREJUDICE**

Assigned to the Hon. Charles R. Breyer

**TO THE HONORABLE COURT, ALL PARTIES, AND THEIR ATTORNEYS OF
RECORD:**

PLEASE TAKE NOTICE that Plaintiffs THE ESTATE OF JOHN DEMING, JR.; and
STIPULATION AND ~~PROPOSED~~ ORDER
DISMISSING ENTIRE ACTION, WITH
PREJUDICE

JOHN DEMING, SR. and LINDA STASI, individually, and as successors-in-interest and wrongful death heirs to DECEDENT JOHN DEMING, JR., and Defendants CITY OF PLEASANTON, DANIEL KUNKEL, ERIC GORA, and MARK SHELDON (hereafter collectively the "parties"), by and through their counsel of record, hereby stipulate and jointly request an Order from the Court to a dismissal of the Plaintiffs' Complaint, the entire action, against all Defendants, with prejudice. Each party agrees to bear its own fees and costs as to this dismissal.

The parties attest that concurrence in the filing of these documents has been obtained from each of the other Signatories, which shall serve in lieu of their signatures on the document.

IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

DATED: January 19, 2018

GERAGOS & GERAGOS, APC

By: /s/ Mark J. Geragos
MARK GERAGOS / BEN J. MEISELAS
Attorneys for Plaintiffs

DATED: January 19, 2018

McNAMARA, NEY, BEATTY, SLATTERY,
BORGES & AMBACHER LLP

By: /s/ Noah G. Blechman
NOAH G. BLECHMAN
Attorneys for Defendants

ORDER

PURSUANT TO STIPULATION, IT IS ORDERED AS FOLLOWS:

The Court hereby dismisses this entire action, with prejudice, as to all claims alleged by Plaintiffs. Each party to bear its own fees and costs.

IT IS SO ORDERED

Dated: January 22, 2018


Hon. Charles R. Breyer, U.S. Senior District Judge